REMARKS

Claims 1, 3-9, 11 and 13-19 are all the claims pending in the application. Claims 1, 3-9, 11, 13-19 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2003/0225696 A1 (hereinafter, "Niwa") in view of U.S. Patent No. 6,055,543 (hereinafter "Christensen"). Applicant submits the following in traversal.

Claims 1, 3-9, 11, 13-19 rejected under §103(a) over Niwa in view of Christensen

Applicant maintains that claim 1 is patentable over Niwa in view of Christensen. Applicant submits that Niwa in view of Christensen fail to teach or suggest forming a header based on the extracted information, in combination with other elements of the claim.

In the Office Action, the Examiner states that "Niwa teaches in paragraphs 129-130 that the extracted information may include metadata, time and date information, a title, keywords, and other additional data relating to the video segment." Page 7. Further, the Examiner states that "[b]ecause the header includes a creation date, copyright information and application information, it is in fact based on the extracted information of Niwa, which also includes creation date and application information." See id.

Applicant disagrees. Figure 7 of Niwa discloses the types of meta data that can be extracted from a SMIL file (paragraph 130). The extracted meta data are: "video ID," "description, keywords," "date/time," "script," "location link," "stock symbols," "sector," and "time duration." See paragraph 130 and Fig. 7.

Christensen, however, discloses a header 52 including application information, creation date and copyright information. In Christensen, "application" refers to a particular program such as Microsoft Word. See col. 1, lines 22-29. Clearly, the header 52 of Christensen cannot be formed from the extracted meta data of Niwa because Niwa does not teach or suggest extracting

application information and copyright information that are included in the header 52, for example.

In addition, one skilled in the art would not combine the teachings of Niwa and Christensen. In Niwa, metadata are extracted from the SMIL file and stored in the fields 146, 148, 150, 154, 156 or 158 (paragraph 134 wherein these fields are included in content description table 140 (FIG 7). The content description table 140 is stored in the description database 130 (FIG. 6 and paragraph 72) while content files 162 are stored in the video segment store 138 (paragraph 85). Referring to FIG. 6, the description database 130 and the video segment store 138 are separate places. Thus, Niwa discloses extracting metadata from SMIL document, and storing the metadata in at a location that is different from where the content file is stored. Thus, Niwa teaches away from modifying the teachings of Niwa with Christensen to store the content description table 140 and the content files 162 in the same file.

Applicant argues that the claimed invention is also patentable for the following reasons:

1. Applicant argues that the metadata of an exemplary embodiment of the present invention is different from the metadata of Christensen. In Christensen, a wrapper file is created by binding metadata to a content file. The metadata of Christensen includes the search information for the content file. Using the metadata of Christensen, the content file can be found without reading the content file itself. On the contrary, metadata of the present invention includes the information to adjust the reproduction time of each media object, layouts on a screen, and screen division, etc.

2. In an exemplary embodiment of the present invention, metadata is extracted from the already existing SMIL file. However, in Christensen, metadata is created by analyzing the content file.

3. Niwa relates to a customized multimedia content method, apparatus, media and signals to provide relevant multimedia content to a user while reducing the jump cuts. On the contrary, Christensen relates to a method to search files regardless of the file type or the computer system without additional network traffic by generating and using wrapper for each content files stored in each computer, rather than using centralized search database. Thus, it would not have been obvious to combine the teachings of Niwa and Christensen.

4. Even assuming arguendo, that the Examiner is arguing that the package in Christensen, at column 6, line 22, corresponds to the SMIL integrated file, the package and the SMIL integrated file are totally different. The multiple files included in the package do not have any relations among themselves. On the contrary, the resource files included in the SMIL integrated file are closely related, in the exemplary embodiment of the invention. Their reproduction time will he controlled by the SMIL file which is also included in the same SMIL integrated file, in the exemplary embodiment.

For at least the above reasons, Applicant submits that claim 1 is patentable.

For reasons similar to those submitted for claim 1, claim 11 is patentable.

Claims 3-7 and 13-19, which depend from claim 1 or 11, are patentable for at least the reasons submitted for their respective base claims.

Applicant submits that claim 3 is patentable because Niwa in view of Christensen fail to teach or suggest a method wherein the header comprises information on the number of the

plurality of files included in the SMIL integrated file and information on a length of the SMIL integrated file, in combination with other elements of the claim. Although Christensen discloses "offsets to each part of the file," offsets merely indicate where each part of the package 40 starts, i.e., where TAG1 50, TAG2 50 and TAG3 50 start. Also, the offsets do not indicate the length of the package 40 itself. Therefore, offsets do not convey information on a length of the SMIL integrated file, as recited in claim 3.

Further, the Examiner additionally cites Christensen as disclosing that "tag size field 58 indicates length of the tag 50, or alternatively, the length of metadata in tag data field 60," at column 7, lines 34-36. The tag size field 58, however, is not part of the header 52 but is part of a different component of the package 40. See Fig. 6 (showing tag size field 58 to be part of TAG1 50, which is separate from the header 52 shown in Fig. 5). Therefore, Christensen cannot teach or suggest a method wherein the header comprises information on the number of the plurality of files included in the SMIL integrated file and information on a length of the SMIL integrated file in combination with other elements of the claim.

Applicant submits that claim 5 is patentable because Niwa and Christensen fail to teach or suggest a method, wherein the header comprises information on the number of the plurality of files included in the SMIL integrated file and information on a length of the SMIL integrated file, in combination with other elements of the claim. In the rejection of claim 1, the Examiner cites the directory 54 of Christensen as corresponding to the claimed file indexing information. The directory 54, however, does not contain any sort of length information and, therefore, claim 5 is not obvious.

For reasons similar to those submitted for claims 3 and 5, claims 13 and 15 are patentable.

Applicant submits that claim 8 is patentable because Niwa and Christensen fail to teach or suggest a method wherein the operation of extracting the information comprises extracting respective name, length, and offset information of each of the plurality of files included in the SMIL integrated file, and the operation of providing the predetermined resource file comprises searching for the predetermined resource file by referring to the respective name, length, and offset information of each of the plurality of files included in the SMIL integrated file, in combination with other elements of the claim. Although the Examiner argues that Christensen teaches the aforementioned features of claim 8, Applicant disagrees.

As shown above, the length information cited by the Examiner at column 7, lines 33-36, of Christensen is tag length information that is within TAG1 50 itself and is not length information of the content 20 of the package 40 in Fig. 5. In other words, Christensen does not teach or suggest searching for the predetermined resource file by referring to the length information, for example.

Claim 9, which depends from claim 8, is patentable for at least the reasons submitted for claim 9.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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